

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Erasmio Humberto LIMA MARTINEZ

Case No. 2:16-mj-401

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of on or about 8-30-16 to 9-1-16 in the county of Franklin in the Southern District of Ohio, the defendant(s) violated:

Code Section

Title 21 USC 841 (a)(1) and 846

Offense Description

Conspiracy to Possession with intent to distribute more than 500 grams of heroin

This criminal complaint is based on these facts:

See attached Affidavit

☒ Continued on the attached sheet.

Janey Carroll
Complainant's signature

Janey Carroll, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 09/01/2016

City and state: Columbus, Ohio

Judge's signature

US Magistrate Judge, Norah McCann King

Printed name and title

AFFIDAVIT

I, Janey Carroll, having been duly sworn depose and state:

1. I am a Special Agent of the Drug Enforcement Administration (DEA) assigned to the Detroit Field Division, Columbus District Office. As such, I am an “investigative or law enforcement officer” of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18 United States Code, Section 2516(1). I have been a Special Agent for the DEA for approximately sixteen years, during which time I have participated in numerous investigations involving narcotic trafficking. I have received specialized training in the subject of narcotics trafficking and money laundering from the DEA and have been personally involved in investigations concerning the possession, manufacture, transportation, distribution and importation of controlled substances, as well as methods used to finance drug transactions. The information set forth in this affidavit comes from my personal involvement in this investigation, as well as information provided to me by other law enforcement officers.

2. The Franklin County Sheriff's Office (FCSO) and the DEA conducted an investigation into a heroin drug trafficker originally known only as Daniel LNU. Agents later identified Daniel LNU as Rodolfo ERAZO. On or about August 2016 the FCSO relayed the following information, in substance, from a confidential source (CS). The CS advised Daniel LNU (Rodolfo ERAZO) was trafficking in heroin in the Columbus, Ohio area. The CS indicated he could be contacted via 614-931-1629 and the CS could place an order for heroin. On August 30, 2016, arrangements were made to purchase approximately an ounce of heroin from ERAZO for

\$1,200.00. With the assistance of the CS, FCSO Det. M. Eagan and the CS met with ORAZO at a prearranged meet location and purchased approximately 26.7 gg of heroin from ORAZO. The heroin was field tested positive.

3. On August 31, 2016, Det. Eagan contacted ORAZO via 614-931-1629, and made arrangements to conduct and undercover purchase of two ounces of heroin for \$2,400.00. Det. Eagan then met with ORAZO at a prearranged meet location and purchased approximately two ounces of heroin, which was later field tested positive. ORAZO arrived for the meet location at Lowes (Columbus, Ohio) with a female later identified as Ana ROSALES. ROALES walked towards the store as ORAZO walked to meet with Det. Eagan. During this purchase Det. Eagan negotiated purchasing 35 ounces (one kilogram) of heroin for \$1,025.00 an ounce. Arrangements were made to meet ORAZO on September 1, 2016, to complete the purchase of the kilogram of heroin.

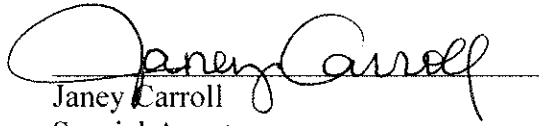
4. During the course of this investigation agents conducted surveillance of ORAZO. Agents identified his address of 1996 Cannington Court, Columbus, Ohio. On September 1, 2016, agents established surveillance on the Cannington Court address. Agents placed a call to ORAZO and agreed to meet at a predetermined location to purchase a kilogram of heroin. Agents then observed ORAZO leave his residence and proceed to the meet location. At the same approximate time agents observed a Hispanic male later identified Erasmo Humberto LIMA-MARTINEZ in a black Acura follow ORAZO from nearby his residence to the meet location at a sports complex in Columbus, Ohio (Franklin County). While Det. Eagan and ORAZO met LIMA-MARTINEZ waited in his vehicle a few parking from the meet. ORAZO obtained a package which contained approximately one kilogram of heroin from his vehicle and entered Det. Eagan's vehicle. Once Det. Eagan observed the kilogram and exchanged official

government funds for the heroin, agents arrested ORAZO and LIMA-MARTINEZ. The kilogram of heroin field tested positive.

5. ORAZO, LIMA-MARTINEZ, and ROSALES were advised their Constitutional rights which they waived and provided post-arrest statements. All subjects were spoken to in Spanish, interpreted by Tina Krieg. ORAZO advised agents he sold to the guy (Det. Eagan) a few ounces of heroin and the kilogram of heroin agents located upon his arrest. LIMA-MARTINEZ was present to make sure ORAZO was safe during the heroin transaction. LIMA-MARTINEZ knew he was selling heroin. ORAZO stated ROSALES didn't want him selling narcotics and she told him to stop if that was what he was doing. LIMA-MARTINEZ was present during the deal to make sure the transaction was completed. LIMA-MARTINEZ was aware that ORAZO was conducting a narcotics transaction. Agents spoke to LIMA-MARTINEZ and stated he was not meeting with anyone today he was going to play soccer with some friends at the sports complex. Agents spoke to ROSALES and she advised agents she was aware that ORAZO was up to something suspicious. On August 31, 2016, ROSALES observed ORAZO and LIMA-MARTINEZ in her garage exchanging a box and ORAZO was later in possession of a large amount of currency. ORAZO and ROSALES were in an argument about his recent activities.

6. On August 31, 2016, agents obtained a state of Ohio search warrant for 1996 Cannington Court, Columbus, Ohio. On September 1, 2016, after the arrest of ORAZO and LIMA-MARTINEZ, agents initiated the search of the residence and located approximately 7 ounces of heroin on a shelf in the garage of the residence.

7. Based upon this information, your affiant believes probable cause exists that ORAZO, LIMA-MARTINEZ, and ROSALES have violated 21 U.S.C. §§ 841(a)(1) and ^{846 92}~~864~~, Conspiracy to possess with intent to distribute more than 500 grams of heroin, a Scheduled I drug.


Janey Carroll
Special Agent
Drug Enforcement Administration

Subscribed and Sworn to before me
this 1st day of September 2016.



Honorable Norah McCann King
U.S. MAGISTRATE JUDGE